

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

GULF MARINE FABRICATORS , LP	§	
Plaintiff,	§	
	§	
VS.	§	C. A. No. 2:16-cv-00430
	§	Rule 9(h) - Admiralty
THE ATP INNOVATOR, bearing IMO No.	§	
742, her tackle, furniture, apparel,	§	
appurtenances, etc., <i>in rem</i> , and AMERINDO	§	
SERVICES LTD. and BLUE SKY LANGSA	§	
LTD., <i>in personam</i> ,	§	
Defendants.	§	

**MOTION TO WITHDRAW AS COUNSEL**

TO THE COURT:

COME NOW Amerindo Services Ltd., solely in its capacity as Claimant to the ATP INNOVATOR, and *in personam* Defendants Amerindo Services Ltd. (“Amerindo”) and Blue Sky Langsa Ltd. (“Blue Sky”), and file this Motion to Withdraw as Counsel for the aforementioned entities, and respectfully would show:

**I.**

The undersigned is counsel for Claimant Amerindo and *in personam* Defendants Amerindo and Blue Sky. Amerindo and Blue Sky have informed the undersigned that there are no funds available to pay the undersigned’s past outstanding invoices, and for any services and expenses going forward. For this reason, the undersigned requests to withdraw as counsel. Amerindo and Blue Sky consent to the filing of this motion.

WHEREFORE, PREMISES CONSIDERED, Amerindo Services Ltd., solely in its capacity as Claimant to the ATP INNOVATOR, and *in personam* Defendants Amerindo Services Ltd. and

Blue Sky Langsa Ltd. pray that this motion be in all respects granted, and for such other relief to which they may be entitled.

Respectfully submitted,

By: /s/ Richard L. Gorman

Richard L. Gorman  
State Bar No. 00784155  
Fed. I.D. 15685  
12335 Kingsride Lane #354  
Houston, Texas 77024  
Telephone: (832) 725-4026  
Email: rg@richardgormanlaw.com  
Attorney-in-Charge for Claimant  
Amerindo Services Ltd. and *in personam*  
Defendants Amerindo Services Ltd. and  
Blue Sky Langsa Ltd.

OF COUNSEL:

RICHARD GORMAN LAW

**CERTIFICATE OF CONFERENCE**

I certify that on this 10th day of April, 2018, emails were exchanged between counsel. Gulf Marine Fabricators, LP takes no position with respect to the motion, but does object to the extent the requested withdrawal would result in a delay of any current court deadlines or the vessel status trial. ASRC Energy Services Omega, LLC takes no position on the motion.

/s/ Richard L. Gorman  
Of Richard Gorman Law

**CERTIFICATE OF SERVICE**

I certify that on this 10th day of April, 2018, a true and correct copy of this pleading was served on counsel of record ***Via Notice of Electronic Filing.***

/s/ Richard L. Gorman  
Of Richard Gorman Law

01879.Motion.04.10.18